Air Enforcement: Missouri Department of Natural Resources and St. Louis Medical School Complex Enter into Administrative Order on Consent

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05/12/2025

The Missouri Department of Natural Resources ("MDNR") and The Washington University ("WU") entered into a May 2nd Administrative Order on Consent ("AOC") addressing an alleged violation of an Air Permit. See No. APCP-2025-017.

The AOC provides that WU owns and operates a medical school complex in St. Louis, Missouri.

The complex is stated to include a powerplant with air pollutant sources that include heating boilers, emergency generators, and fuel oil tanks.

The powerplant operates pursuant to a Part 70 Clean Air Act Operating Permit ("OP").

The OP is stated to have expired on June 18, 2023, and the renewal application was due by December 18, 2022. The filing fee payment was received on January 27, 2023. As a result, the AOC provides that WU has been operating without a valid OP. However, WU is stated to have held a good faith belief from January 31, 2023 to December 27, 2024, that MDNR considered the OP to be unexpired pending MDNR's determination on the renewal application.

The AOC provides that to the best of MDNR's and WU's knowledge, the powerplant has continued to operate in compliance with the OP and has remained cooperative through the enforcement process.

A penalty of $3,750.00 is assessed. However, it is suspended on the condition that there be no further violations of the AOC during a two-year period following the effective date of this document.

A copy of the AOC can be downloaded here.